

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

ALEXANDER E. JONES,

Debtor.

)
) Chapter 11
)
) Case No. 22-33553 (CML)
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)
)

**TEXAS PLAINTIFFS' AMENDED NOTICE OF
RULE 2004 DEPOSITION OF DAVID JONES**

To: David Jones, by and through his counsel of record, Stephen A. Roberts,
Stephen A. Roberts, P.C., 1400 Marshall Lane, Austin, Texas 78703

Please take notice that, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Rule 2004-1 of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”), the Texas Plaintiffs Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and the Estate of Marcel Fontaine will take the oral deposition of David Jones. The deposition will commence on October 2, October 3, and October 4, 2023, starting at 9:00 a.m. Central Time each day at the offices of Jackson Walker LLP, 100 Congress Avenue, Suite 1100, Austin, TX 78701, or at such other date, time and place as the parties may agree.¹

Please be advised that the scope of the deposition includes, but is not limited to, any matter relevant to: (i) any Document² produced in response to any discovery request in this case or in the FSS Case, including any banking records and transaction Documents; (ii) the Debtor’s Assets, liabilities, and financial condition; (iii) any Payments, Transfers, Gifts, or distributions of any Assets involving the Debtor or his entities, directly or indirectly; (iv) any agreements or contracts between You and the Debtor concerning any Assets; (v) any plan that may be introduced in the Debtor’s bankruptcy or in the FSS Case, insofar as it concerns the Debtor; and (vi) any topics

¹ This notice amends the *Texas Plaintiffs’ Notice of Rule 2004 Deposition of David Jones* [ECF No. 420].

² Capitalized terms undefined herein have the meaning ascribed to them in the *Notice of the Official Committee of Unsecured Creditors’ Bankruptcy Rule 2004 Examination of David Jones* [ECF No. 275].

covered in the *Subchapter V Trustee's Initial Findings of Free Speech Systems, LLC Investigation* filed on the docket in the FSS Case at ECF Nos. 549 and 550, and the supplement thereto filed at ECF Nos. 573 and 574.

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Dated: September 7, 2023

/s/ Jennifer J. Hardy

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*Bankruptcy Co-Counsel to the Texas
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CERTIFICATE OF SERVICE

I certify that on September 7, 2023, a true and correct copy of the foregoing was served on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Jennifer J. Hardy

Jennifer J. Hardy